

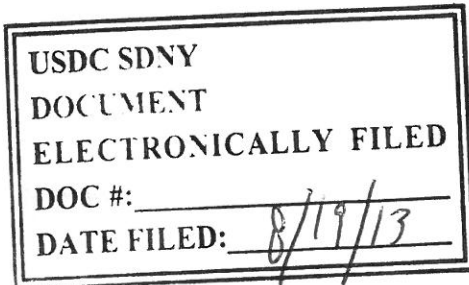
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August 16, 2013

MEMO ENDORSED

VIA FACSIMILE
212/805-7991

The Honorable J. Paul Oetken
Thurgood Marshall United States Courthouse
40 Foley Square, Room 2101
New York, NY 10007

Re: *Fort Worth Employees' Retirement Fund v. J.P. Morgan Chase & Co., et al.*,
No. 1:09-cv-03701-JPO-JCF (S.D.N.Y.)

Dear Judge Oetken:

I write on behalf of all parties in the above-captioned action to seek a modest amendment to the class certification briefing schedule.

Plaintiffs' motion for class certification is currently due on August 30, 2013. However, defendants' Rule 30(b)(6) designees, who will testify on issues relevant to class certification, are not available to sit for deposition until September 12 and 13, 2013. Accordingly, we request that the due date for plaintiffs' opening class certification motion be moved to September 27, 2013 – two weeks after completion of defendants' Rule 30(b)(6) deposition – and the due date for defendants' opposition brief be moved to January 10, 2014. Plaintiffs will serve their reply brief on March 21, 2014 – the current due date for plaintiffs' reply. Thus, the requested amendments will not affect the date on which class certification briefing is fully submitted to the Court.

Accordingly, we request that the Court enter the following amended class certification schedule:

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**Robbins Geller
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The Honorable J. Paul Oetken
August 16, 2013
Page 2

Action	Current Due Date	Amended Due Date
Deadline for plaintiffs to complete class certification discovery (except for depositions of defendants' experts) and serve class certification motion	August 30, 2013	September 27, 2013
Deadline for defendants to complete class certification discovery and serve class certification opposition brief	December 13, 2013	January 10, 2014
Deadline for plaintiffs to depose defendants' class certification experts and serve reply brief	March 21, 2014	March 21, 2014

Respectfully submitted,



DARRYL J. ALVARADO

DJA:llf

cc: All Counsel (via e-mail)

SO ORDERED:



J. PAUL OETKEN
U.S.D.J.

8-16-13